

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

CRIMINAL NO. 03 - _____

:

DATE FILED: _____

v.

:

VIOLATIONS:

RONALD BRADFORD and
JAMES LYNCH

:

21 U.S.C. § 846- (Conspiracy to distribute
more than 11 grams of cocaine base

a/k/a "James Lench" ("crack") - 1 Count)

:

21 U.S.C. § 841 (a)(1)- (Distribution of
cocaine base "crack" - 2 Counts)

:

21 U.S.C. § 860(a)-(Distribution within
1,000 feet of a school- 2 Counts)

- : 21 U.S.C. § 860(a)- (Possession with intent to distribute a controlled substance within 1,000 feet of a school - 1 Count)
- : 18 U.S.C. § 924 (c)(1)(A) (Possession of a firearm in furtherance of a drug trafficking crime - 1 Count)

: 28 U.S.C. § 2461(c)
18 U.S.C. § 924 (d)
(Notice of Criminal Forfeiture)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From on or about April 17, 2003 through on or about April 18, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendants

RONALD BRADFORD
and
JAMES LYNCH
a/k/a "James Lench"

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute and possess with the intent to distribute, more than 11 grams, that is approximately 11.348 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of a public school, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B), and 860(a).

MANNER AND MEANS

It was part of the conspiracy that:

1. Defendants sold crack cocaine from an apartment at 2010 Orleans Street in Philadelphia.
2. Defendant RONALD BRADFORD, worked outside the property at 2010 Orleans Street to collect money from purchasers of cocaine base ("crack") and then relayed this information, by phone and in person, to defendant JAMES LYNCH. LYNCH then distributed the crack from inside an apartment at 2010 N. Orleans Street.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object(s), the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. On or about April 18, 2003, at 2010 Orleans Street in Philadelphia, defendants RONALD BRADFORD and JAMES LYNCH, did distribute 30 milligrams of cocaine base ("crack") to M.. W.

2. On or about April 18, 2003, at 2010 Orleans Street in Philadelphia, defendants RONALD BRADFORD and JAMES LYNCH, did distribute 40 milligrams of cocaine base ("crack") to F. G.

3. On or about April 18, 2003, defendants RONALD BRADFORD and JAMES LYNCH possessed with the intent to distribute approximately 11 grams of cocaine base ("crack").

4. On or about April 18, 2003, defendant JAMES LYNCH possessed a firearm, that is
a Smith and Wesson .38 caliber revolver, serial number J640491, loaded with five live cartridges, and a Smith and Wesson .38 caliber revolver, serial number D523014, loaded with six live cartridges, inside the first floor apartment at 2010 N. Orleans Street.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

1. On or about April 18, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendants

RONALD BRADFORD
and
JAMES LYNCH
a/k/a "James Lench"

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine base ("crack"), a Schedule II controlled substance to M. W.

In violation of Title 21, U.S.C. 841(a)(1).

COUNTS THREE, FIVE, AND SEVEN

THE GRAND JURY FURTHER CHARGES:

1. On or about April 18, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendants

RONALD BRADFORD
and
JAMES LYNCH
a/k/a "James Lench"

knowingly and intentionally distributed and possessed with intent to distribute, a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Frances Willard Middle School, located at 2900 Emerald Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code Section 841 (a)(1).

In violation of Title 21, U.S.C. 860 (a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

1. On or about April 18, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendants

RONALD BRADFORD
and
JAMES LYNCH
a/k/a "James Lench"

did knowingly and intentionally distribute less than 2 grams, that is approximately 40 milligrams of a mixture or substance containing a detectable amount of cocaine base ('crack"), a Schedule II controlled substance to F. W.

In violation of Title 21, U. S. C. 841 (a)(1).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about April 18, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendants

RONALD BRADFORD
and
JAMES LYNCH
a/k/a "James Lench"

knowingly and intentionally possessed with intent to distribute more than 5 grams, that is approximately 11.348 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES:

1. On or about April 18, 2003, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

JAMES LYNCH

knowingly possessed a firearm, that is a Smith and Wesson .38 caliber revolver, serial number J640491, loaded with five live cartridges, and a Smith and Wesson .38 caliber revolver, serial number D523014, loaded with six live cartridges, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is conspiracy, and distribution and possession with intent to distribute within 1,000 feet of a public school, cocaine base ("crack"), in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1) (B), and 860(a), as charged in counts one through seven of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 21, United States Code, Sections 846, 841(a)(1) & (b)(1) (B), 860(a) and Title 18, United States Code, Section 924(c)(1) as set forth in Counts One through Eight of this Indictment, the defendants

RONALD BRADFORD
and
JAMES LYNCH
a/k/a "James Lench"

shall forfeit to the United States of America, all firearms and ammunition involved in the commission of these offenses, including but not limited to:

- (a) One Smith and Wesson .38 caliber revolver, serial number J640491;
- (b) One Smith and Wesson .38 caliber revolver, serial number D523014; and
- (c) eleven (11) live .38 caliber cartridges

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney